

**Before the  
Federal Communications Commission  
Washington, DC 20554**

In the Matter of	)	
	)	
Review of the Commission's Part 95 Personal	)	WT Docket No. 10-119
Radio Service Rules	)	

**Comments to the Notice of Proposed Rule Making**

We are writing in response to the posting of the proposed rules changes for Personal Radio Services, specifically the changes to parts related to General Ground Mobile Radio Service (GMRS). We recognize that there are many items under review, but we are commenting on items which will impact our public service application:

We do not agree with any proposed rules changes addressing reduction of power, in both hand held and mobile radios, as this will significantly affect the ability for providing communications.

We do not agree with proposed rule changes that would restrict GMRS repeater operations.

We do not agree with the proposed new rules regarding geographic restrictions

We do not agree with proposed rules for Narrowbanding GMRS Channels

We are in partial agreement with some of the suggestions for licensing changes.

We are in partial agreement with the proposed eligibility changes

**Background**

The West Seattle Emergency Communications Hubs are part of a coalition of neighborhood community groups and volunteers that have created a citizen based disaster response system called the Emergency Communications Hubs. We are located to the west of downtown Seattle, Washington, and have 23% of the population of Seattle living on our peninsula. We are connected to Seattle by 2 bridges and to the rest of Puget Sound by land mass to the south.

The 2001 Nisqually Earthquake was a wake up call for West Seattle. We formed this Hub system because Seattle is in a major earthquake fault zone and in the event of a serious disaster, we believe we will be isolated from the city, and disaster response resources would be limited to only what is on the peninsula at the time (fire and police response in particular). There are no hospitals in West Seattle; the nearest medical facility is 20 miles to the south.

The Southwest District Council, the Delridge District Council and the Southwest Precinct Advisory Council, which represent 19 community groups and neighborhoods, made emergency preparedness one of their top work priorities for 2002 and on. The SW Precinct Advisory Council in particular was supportive of neighborhoods taking

responsibility for being self supporting during the first 3 days after an event. By 2007, the West Seattle Emergency Communications Hub system was proposed and adopted.

There are 9 Hub locations established throughout West Seattle, and we have a mobile radio unit as a backup. In the event of a serious emergency, when power, communications and public services are affected, each Hub would be expected to activate. Each Hub has a leader, who is equipped with a communications “go bag”, and they would set up their Hub location for operation. The Hub is a place where neighbors can go to report problems and ask for help, or offer help and share resources. Our 9 Hubs are linked by a GMRS repeater system and each leader is a licensed GMRS operator. Some requests for supplies, equipment or assistance which are brought to the Hub may be filled locally, but if not, the leader can request (or offer) help from the other West Seattle Hubs. In addition, we have established a Net Control location, which is a joint operation center with the Seattle Auxiliary Communications Service (ACS), which is the amateur radio operators registered as emergency workers with the City. ACS would then provide direct communication with the City of Seattle’s Office of Emergency Management to request resources and report on conditions. Our role is essential in collecting neighborhood level information through our GMRS network and passing it via ACS to the City so the city departments can create a comprehensive response to any disaster.

We were the first group in Seattle to conduct radio tests and evaluated services that could be used for our unique geographic conditions. We are a very large area of Seattle and have shoreline and hilly terrain. We do not believe that cell phone or internet systems will be a dependable way to communicate in the first few days of a disaster. We first tested Family Service Radios and those failed to connect all neighborhoods. We tried GMRS with simplex and that connected most, but still not all, of the neighborhoods. It is only with a repeater that we can reach across the West Seattle peninsula. Funding for all our equipment, including go-bags, radios and repeaters, was acquired in 2009 through a one-time budget allocation from the Seattle City Council Regional Development and Sustainability Committee.

With that context, here are our comments on the proposed rules changes.

#### GMRS Portable Devices Paragraphs 31 – 35.

We need to retain the power limits as they exist today. We initially wanted to use Family Service Radios (FRS), as that would have been a cheap and readily available solution for us. Those did not work as we needed, please see attachment 1 for our results.

#### Paragraph 34 (Elimination of Repeaters)

We completely disagree with the question posed in Paragraph 34, asking if repeaters should be eliminated. Our repeater operates at 35 watts. We would have to reconfigure our system to operate without the repeater, and we know from testing without the repeater that coverage with 5 watt radios is not sufficient to connect all Hubs.

#### Proposed new paragraph 95.35 (b)(2) Geographic Restriction

This would completely dismantle our repeater network and restrict our mobility, as we are north of Line A. As stated before, this would cause a complete reconfiguration of our system. Loss of our 35 watt repeater would severely impact direct Hub to Hub communications in our large and geographically challenging area. Loss of the 50 watt mobile unit dismantles our backup system, should a Hub location be too dangerous to operate from, or should we need additional field communication in unplanned places.

#### Narrowbanding GMRS Channels, Paragraphs 36 – 37

If this rule change is adopted, the West Seattle Hubs would be the group most affected. We would have to replace 7 of our radios at a cost of \$140 apiece, for a total of almost \$1,000. This would constitute a severe financial burden on our all-volunteer efforts. We were very fortunate to get the small City of Seattle allocation when we did, as there is no additional money forthcoming in the foreseeable future, given current economic conditions.

#### Station Licensing, Paragraphs 24 – 28

We have mixed reactions to this set of proposed changes. We believe that licensing of GMRS should remain, but approve of extending the license period to be 10 years. Holding licenses on one hand limits the number of volunteers who would be radio operators in our system, but it reinforces the importance of this role in our Hub structure by adding to a person's responsibility. Licensing would also restrict the number of operators in an area to serious radio operators, as opposed to FRS, and thus the channels would remain less congested in an emergency situation. This will help with orderly, effective radio operations during disaster response. However, we would also be quite happy if the Rules would be modified to reduce the GMRS licensing fee to be comparable with Amateur licensing fees.

#### Eligibility Paragraphs, 29 – 30.

We highly support the removal of age restrictions, so that volunteers under the age of 18 can participate in our emergency preparedness efforts and drills.

Regarding licensing businesses, we believe the proposed change to allow businesses to use this portion of the spectrum not be in the best public interest. We have already encountered sizable encroachment on the GMRS frequencies by unlicensed operators conducting business operations. This has, on occasion, interfered with our weekly radio check-in activities, so we can see that businesses are searching for free frequencies. They have already been allocated another part of the spectrum and they should remain in those designated frequencies.

#### In Summary

Based on the proposed rules changes, we would have to discard our repeater and mobile unit, and would not be able to replace them due to the Line A restriction. We could retain only some of our existing portable radios, but would have extremely limited Hub to Hub communication without the repeater and the reduced power limits.

We would also be in high competition in a disaster for airtime with unlicensed people who would have unrestrained access to the GMRS frequencies. We are concerned about the toll on our volunteers who would have to work around all the shortcomings of a reconstructed system which would comply with the proposed rules changes. These specific changes, in our opinion, are not in the public interest.

Respectfully Submitted

The West Seattle Emergency Communications Hubs Leaders:

Tony Fragada, Alki Hub

Sylvia Rolle, Admiral Hub

Patty Sponseller, Alaska Junction Hub

Sharonn Meeks, Fairmount Hub

Dorsol Plants, Highland Park Hub

Matt Swenson, Pigeon Point Hub

Cindi Barker, Morgan Junction Hub

Eve Enslow, Olympic Heights Hub

Gordon Wiehler, Fauntleroy Hub

Karen Berge, Mobile Hub

Deborah Greer, Mobile Hub

GMRS Repeater Manager, - Ronald Zuber WQJE-383 / KC7RWT

## Attachment 1

### West Seattle Emergency Communications Locations Radio Test December 12, 2008 FRS Radios

	Base	Alki	Admiral	Alaska J	Pigeon Pt	Fairmont	Hansen V	Morgan J	Fauntleroy	EC Hughes
Base heard										
Base heard by										
Alki heard										
Alki heard by										
Admiral heard										
Admiral heard by										
Alaska J heard										
Alaska J heard by										
Pigeon Pt heard										
Pigeon Pt heard by										
Fairmont heard										
Fairmont heard by										
Hansen V heard										
Hansen V heard by										
Morgan J heard										
Morgan J heard by										
Fauntleroy heard										
Fauntleroy heard by										
EC Hughes heard										
EC Hughes heard by										
<i>WSBlog HQ heard</i>										
<i>WSBlog HQ heard by</i>										
<i>Fairmt Sprgs heard</i>										



Reception loud and clear  
Reception garbled or faint  
No reception

additional location tested after 12/13